

Heverly Campbell and Jade Makana Heverly-Campbell as beneficiaries of Pohaikaloa Trust (hereinafter collectively referred to as "Plaintiffs") as set forth herein.

Mullin seeks to dismiss Plaintiffs' First Amended Complaint pursuant to Federal Rules of Civil Procedure 12(b)(2), 12(b)(3), and 12(b)(6). The reasons supporting this Motion are set forth in more detail in the accompanying Memorandum of Law filed contemporaneously herewith.

WHEREFORE, Mullin respectfully requests this Honorable Court dismiss Plaintiffs' First Amended Complaint with prejudice.

Respectfully submitted,

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Dated: September 8, 2017

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 8th day of September, 2017, a true and correct copy of **Defendant Terry Mullin's Motion to Dismiss Plaintiffs' First Amended Complaint** was served via electronic means on all counsel and parties of record:

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